

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

UNITED STATES OF AMERICA)

v.)

No. 1:11-cr- 146-01-SM

JOHN ALLEN WRIGHT)

INDICTMENT

The Grand Jury charges that:

COUNT I

**[Sexual Exploitation of Children]
[18 U.S.C. §2251(a)]**

On a date uncertain, but between November 1, 2010 and April 30, 2011, in the District of New Hampshire, the defendant,

JOHN ALLEN WRIGHT,

did knowingly employ, use, persuade, induce, entice and coerce a minor child, John Doe 1, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, to wit, a computer video file, “xxxxtumnpp.avi”, and in so doing used materials that had been mailed, shipped and transported in interstate commerce by any means.

All in violation of Title 18, United States Code, Section 2251(a) and Section 2256.

The Grand Jury further charges:

COUNT II
[Sexual Exploitation of Children]
[18 U.S.C. §2251(a)]

On a date uncertain, but between November 1, 2010 and April 30, 2011, in the District of New Hampshire, the defendant,

JOHN ALLEN WRIGHT,

did knowingly employ, use, persuade, induce, entice and coerce a minor child, John Doe 1, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, to wit, a computer video file, “xxxxxtum.wmv”, and in so doing used materials that had been mailed, shipped and transported in interstate commerce by any means.

All in violation of Title 18, United States Code, Section 2251(a) and Section 2256.

The Grand Jury further charges:

COUNT III
[Sexual Exploitation of Children]
[18 U.S.C. §2251(a)]

On a date uncertain, but between November 1, 2010 and April 30, 2011, in the District of New Hampshire, the defendant,

JOHN ALLEN WRIGHT,

did knowingly employ, use, persuade, induce, entice and coerce a minor child, John Doe 2, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, to wit, a computer video file, “xxxxxbriteawesome.avi”, and in so doing used materials that had been mailed, shipped and transported in interstate commerce by any means.

All in violation of Title 18, United States Code, Section 2251(a) and Section 2256.

The Grand Jury further charges:

COUNT IV
[Sexual Exploitation of Children]
[18 U.S.C. §2251(a)]

On a date uncertain, but between November 1, 2010 and April 30, 2011, in the District of New Hampshire, the defendant,

JOHN ALLEN WRIGHT,

did knowingly employ, use, persuade, induce, entice and coerce a minor child, John Doe 2, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, to wit, a computer video file, “xxxxxlips.avi”, and in so doing used materials that had been mailed, shipped and transported in interstate commerce by any means.

All in violation of Title 18, United States Code, Section 2251(a) and Section 2256.

The Grand Jury further charges:

COUNT V
[Sexual Exploitation of Children]
[18 U.S.C. §2251(a)]

On a date uncertain, but between July 1, 2011 and July 31, 2011, in the Districts of New Hampshire and Maine, the defendant,

JOHN ALLEN WRIGHT,

did knowingly employ, use, persuade, induce, entice and coerce a minor child, John Doe 3, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, to wit, a computer video file, “sunpohjoo.avi”, said depiction having been transported in interstate or foreign commerce and having been produced using materials that had been mailed, shipped and transported in interstate commerce by any means.

All in violation of Title 18, United States Code, Section 2251(a) and Section 2256.

The Grand Jury further charges:

COUNT VI

**[Possession of child pornography]
[18 U.S.C. §2252A(a)(5)(B)]**

On or about September 1, 2011, in the District of New Hampshire, the defendant,

JOHN ALLEN WRIGHT

did knowingly possess child pornography, to wit: computers containing visual images of “child pornography,” as that term is defined in Title 18, United States Code, Section 2256, said images having been mailed or shipped or transported in interstate or foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

A TRUE BILL

/s/ Foreperson
Grand Jury Foreperson

JOHN P. KACAVAS
United States Attorney

/s/ Helen White Fitzgibbon
Helen White Fitzgibbon
Assistant U.S. Attorney

Date: October 5, 2011